

Part 70 Operating Permit Amendment

Permit Amendment No.: 2421-171-0005-V-04-2 **Effective Date:**

Facility Name: **Jordan Forest Products**
752 Grove Street
Barnesville, Georgia 30204, Lamar County

Mailing Address: 752 Grove Street
Barnesville, Georgia 30204

Parent/Holding Company: Jordan Lumber and Supply Company

Facility AIRS Number: 04-13-171-00005

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Increased production through all lumber drying kilns (ID Nos. 500A through 500D) to 225 million board feet per year.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2421-171-0005-V-04-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-40991 dated April 7, 2016; any other applications upon which this Permit Amendment or Permit No. 2421-171-0005-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 9 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2421-171-0005-V-04-0.

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Jordan Forest Products (hereinafter “facility”) submitted an expedited Title V permit amendment application dated November 17, 2015, which was logged in as Application No. TV-40486, for the authorization to construct and operate a new direct natural gas-fired continuous kiln (ID No. 500D). After the resulting Title V permit amendment (No. 2421-171-0005-V-04-1) was issued, the facility submitted an expedited PSD application dated April 7, 2016, which was logged in as Application No. TV-40991, for replacing the PSD avoidance limits specified in existing Conditions 3.2.2 and 3.2.3 of Title V Permit Amendment No. 2421-171-00015-V-04-1 to a facility-wide kiln drying limit of 225 million board feet per year (MMbf/yr). Since the facility requests for relaxation of the PSD avoidance limits that were placed due to the addition of the continuous kiln (Lumber Drying Kiln 500D), Application No. TV-40991 would address the PSD review and associated requirements that would have been triggered without the PSD avoidance limits. In other words, Application No. TV-40991 is treated as a retro-active PSD application for adding Kiln 500D.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Updated Emission Units

| Emission Units | | Specific Limitations/Requirements | | Air Pollution Control Devices | |
|----------------|--|--|---|-------------------------------|------------------------|
| ID No. | Description | Applicable Requirements/Standards | Corresponding Permit Conditions | ID No. | Description |
| 500A | Lumber Drying Kiln No. 1 Direct Natural Gas-Fired Batch Drying Kiln Burner Capacity = 30 MMBtu/hr Drying Capacity = 65 MMBf/yr Installed in 1982 Modified on 06/01/2014 | 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. | 3.2.1, 3.2.2, 3.3.1, 3.4.1, 3.4.2, 3.4.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4 | N/A | None |
| 500B | Lumber Drying Kiln No. 2 Direct Natural Gas-Fired Batch Drying Kiln Burner Capacity = 30 MMBtu/hr Drying Capacity = 65 MMBf/yr Installed in 1982 Modified on 01/01/2013 | 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. | 3.2.1, 3.2.2, 3.3.1, 3.4.1, 3.4.2, 3.4.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4 | N/A | None |
| 500C | Lumber Drying Kiln No. 3 Direct Natural Gas-Fired Batch Drying Kiln Burner Capacity = 30 MMBtu/hr Drying Capacity = 65 MMBf/yr Installed on 12/13/2004 Modified on 04/01/2015 | 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. | 3.2.1, 3.2.2, 3.3.1, 3.4.1, 3.4.2, 3.4.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4 | N/A | None |
| 700 | Planer Mill | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) | 3.4.1, 3.4.2 | N/A | None |
| 701 | Planer Hog | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) | 3.4.1, 3.4.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7 | 701A | Baghouse |
| 900 | Overhead Truck Loading Bin | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) | 3.4.1, 3.4.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7 | 901 | Truck Loading Baghouse |
| 500D | Lumber Drying Kiln No. 4 Direct Natural Gas-Fired Continuous Drying Kiln Burner Capacity = 40 MMBtu/hr Drying Capacity = 95 MMBf/yr Installed in 2016 | 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. | 3.2.1, 3.2.2, 3.2.3, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5 | N/A | None |

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

** New emission unit is in bold.

*** New and modified conditions are in bold.

3.2 Equipment Emission Caps and Operating Limits

Modified Conditions

- 3.2.1 The Permittee shall not fire any fuel other than natural gas in Lumber Drying Kilns Nos. 1 through 4 (ID Nos. 500A, 500B, 500C, and 500D).
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]
- 3.2.2 The Permittee shall not process more than 225 MMbf/yr of lumber in Lumber Drying Kilns Nos. 1 through 4 (ID Nos. 500A, 500B, 500C, and 500D), combined, during any twelve consecutive months.
[40 CFR 52.21 – PM₁₀ PSD Avoidance]
- 3.2.3 The Permittee shall develop and implement a Work Practice and Preventive Maintenance Program for Lumber Drying Kiln No. 4 (ID No. 500D). The program shall be subject to review and modification by the Division. At a minimum, the following operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs:
[391-3-1-.02(6)(b)1, 40 CFR 52.21(j), and 40 CFR 70.6(a)(3)(i)]
- a. General Work Practice Standards for Wood-Drying Kiln Operation:
 - i. The lumber kiln drying operation target final moisture content will be 12% or greater.
 - ii. The lumber kiln shall be operated following a wet bulb temperature set-point-drying schedule of 220°F or lower.
 - iii. Routines for periodic preventative maintenance are detailed in Paragraphs b, c, d, e, and f of this condition, and are based on manufacturer's recommendations.
 - b. Routine Before or During each Kiln Charge:
 - i. Inspect wet bulb socks and replace as needed. Replace a sock daily if it has a tendency to become hard. Check water flow to the wet bulb.
 - ii. Ensure that all Resistance Temperature Detectors (RTDs) are in the airflow.
 - iii. Check all baffles for damage, record problems and repairs done.
 - iv. Make certain all fans are running. If one "trips out" frequently, investigate to determine the reason and then document the solution.
 - v. Ensure that the kiln computer controller is functioning properly.
 - vi. Check to verify that the heating system is operating properly.
 - c. Weekly Routine:

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- i. Replace wet bulb socks (unless done so on a daily basis).
- ii. Drain oil or water from transducer air supplies.
- iii. Clean tracks through kilns, to remove accumulated dust.
- iv. Ensure all amp-meters are operational.
- d. Monthly Routine:
 - i. Grease lumber truck wheels.
 - ii. Check bearing bolts on fans.
 - iii. Check motor/fan drive belts. Grease fan motors and bearings, and inspect fans for damage. Check fan clearance and rotation. Adjust tension and replace belts if required.
 - iv. Inspect kiln walls and doors for deterioration; schedule repairs if necessary.
 - v. Inspect temperature sensor mounts for damage.
 - vi. Ensure control room's air conditioner/heater is working properly for maintaining correct temperature for electrical components.
 - vii. Inspect air-venting motors for proper attachment to the mounting bases; ensure that arms are functioning properly.
- e. Semi-Annually:
 - i. Check connection on all RTDs.
- f. Annually:
 - i. Check tracks for damage.
 - ii. Inspect area at base of kiln door for damage.
- g. The Permittee shall correct any adverse condition, discovered by an inspection done in accordance with this condition, in the most expedient manner possible and note the corrective action taken. If not immediately correctable, the Permittee shall implement a corrective action plan within 24 hours after an adverse condition has discovered during inspections per Paragraphs b. through f. A record of the adverse condition and the corrective action(s) taken shall be kept.

The Permittee shall also record any exceedances of the work practice standards and preventive maintenance program and corrective action taken to prevent any future exceedances. The record must include the following:

- i. Any time a wet bulb temperature set-point-drying scheduled more than 220°F.
- ii. Any time a final moisture content drying operation targeted less than 12%.

3.3 Equipment Federal Rule Standards

New Conditions

3.3.2 The Permittee shall construct and operate the source or modification as defined in Application No. 40991 that is subject to Georgia Rule 391-3-1-.02(7) in accordance with the application submitted pursuant to that rule. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action.

[40 CFR 52.21(r)(1)]

3.3.3 Approval to construct source or modification as defined in Application No. 40991 shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

[40 CFR 52.21(r)(2)]

3.4 Equipment SIP Rule Standards

Modified Condition

3.4.3 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:

[391-3-1-.02(2)(n)]

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

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- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements****Modified Condition**

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

- a. Method 1 shall be used for selection of sampling site and number of traverse points.
- b. Method 2 shall be used for the determination of stack gas flow rate.
- c. Method 3 or 3A shall be used for the determination of stack gas molecular weight.
- d. Method 4 shall be used for the determination of stack moisture.
- e. Method 5 shall be used for the determination of Particulate Matter concentration.
- f. Method 9 and the procedures of Section 1.3 of the above referenced document shall be used for the determination of opacity.
- g. The procedures of NCASI Wood Products Protocol 1 shall be used to determine VOC concentration from the Lumber Drying Kilns.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any twelve consecutive month period for which the total amount of lumber dried in Lumber Drying Kilns Nos. 1 through 4 (ID Nos. 500A, 500B, 500C, and 500D), combined, exceeds 225 million board feet.

- ii. [Reserved]

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i. Any visible emission from baghouse 701A or 901 which occurs for two consecutive determinations done to comply with Condition 5.2.2.

- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

- i. The twelve-month rolling total of lumber dried in Lumber Drying Kilns Nos. 1 through 4 (ID Nos. 500A, 500B, 500C, and 500D), combined, for each month in the reporting period.

- ii. [Reserved]

6.2 Specific Record Keeping and Reporting Requirements

- 6.2.2 The Permittee shall furnish the Division written notification as follows:
[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1.]
- a. The actual dates of initial startup of the lumber drying kiln (ID No. 500D), within 15 days after such dates.
 - b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit within 60 days after the initial startup.
- 6.2.3 The Permittee shall maintain monthly records of the amount of the dried lumber processed through Lumber Drying Kilns Nos. 1 through 4 (Unit ID Nos. 500A, 500B, 500C, and 500D), combined, necessary to confirm compliance with the production limit in Condition 3.2.2. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. These records shall be retained for at least five years following the day of record. The Permittee shall notify the Division in writing if the combined production through Lumber Drying Kilns 500A, 500B, 500C, and 500D exceeds 18.75 million board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Condition 3.2.2.
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]
- 6.2.4 The Permittee shall, each month, calculate and record the twelve-month rolling total of the board feet of lumber dried in Lumber Drying Kilns Nos. 1 through 4 (Unit ID Nos. 500A, 500B, 500C, and 500D), combined, using the monthly records required in Condition No. 6.2.2. A twelve-month rolling total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.5 [Reserved]